

Message

From: Smalley, Bryant [smalley.bryant@epa.gov]
Sent: 3/20/2019 4:30:53 PM
To: Assunto, Carmen [Assunto.Carmen@epa.gov]; Crossland, Ronnie [Crossland.Ronnie@epa.gov]; Smith, Monica [smith.monica@epa.gov]; Adams, Adam [Adams.Adam@epa.gov]; Loesel, Matthew [loesel.matthew@epa.gov]
CC: Petersen, Chris [petersen.chris@epa.gov]
Subject: RE: media response - approve?

Carmen – I would suggest these changes for clarification:

1. Is there a recommended age/lifetime of an aboveground storage tank? Same question for underground storage tanks.

There is no age limit or lifespan defined in the regulations on either aboveground storage tanks (ASTs) or underground storage tanks (USTs), as long as they are maintained in accordance with tank specific Industry Standard (such as API or STI or UL).

2. This document refers to regional inspectors. Who inspects the tanks – trained personnel in the company, an outside company, EPA personnel or someone else?

The document you are referencing is the National Spill Prevention Control & Countermeasure (SPCC) Inspector Guidances document. This chapter ~~that~~ discusses inspections that an SPCC subject facility must ~~would have to~~ do, or have done, by a Tank Inspector knowledgeable in the applicable standards. These Inspectors can be company employees, or contractors. SPCC Regulations require subject facilities to follow industry accepted standards, mentioned above, to inspect & maintain their storage tanks. For USTs specifically, older tanks must have Corrosion Protection (CP) that is checked regularly and inspected by a certified corrosion expert. In Texas, regulated UST sites are inspected by the TCEQ and covered under 30 TAC Chapter 334.

Bryant

From: Assunto, Carmen
Sent: Wednesday, March 20, 2019 10:41 AM
To: Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smith, Monica <smith.monica@epa.gov>; Adams, Adam <Adams.Adam@epa.gov>; Loesel, Matthew <loesel.matthew@epa.gov>; Smalley, Bryant <smalley.bryant@epa.gov>
Subject: media response - approve?

I had several people weigh in on this. Here's one final look for your approval.

Suggested response:

Good Morning Tina,
Here is some information in response to your questions.

1. Is there a recommended age/lifetime of an aboveground storage tank? Same question for underground storage tanks.

There is no age limit or lifespan defined in the regulations on either aboveground storage tanks (ASTs) or underground storage tanks (USTs), as long as they are maintained in accordance with tank specific Industry Standard (such as API or STI or UL).

2. This document refers to regional inspectors. Who inspects the tanks – trained personnel in the company, an outside company, EPA personnel or someone else?

The chapter that discusses inspections that an SPCC subject facility would have to do, or have done, by a Tank Inspector should be knowledgeable in the applicable standards. These Inspectors can be company

employees, or contractors. SPCC Regulations require subject facilities to follow industry accepted standards, mentioned above, to inspect & maintain their storage tanks. For USTs specifically, older tanks must have Corrosion Protection (CP) that is checked regularly and inspected by a certified corrosion expert. In Texas, regulated UST sites are inspected by the TCEQ and covered under 30 TAC Chapter 334.

From: Gray, David
Sent: Tuesday, March 19, 2019 1:52 PM
To: Macias, Tina <tmacias@khoul.com>; Assunto, Carmen <Assunto.Carmen@epa.gov>
Subject: RE: Press Inquiry from KHOU deadline today

Adding our PIO Carmen Assunto.

From: Macias, Tina <tmacias@khoul.com>
Sent: Tuesday, March 19, 2019 1:49 PM
To: Gray, David <gray.david@epa.gov>
Subject: Press Inquiry from KHOU deadline today

Good afternoon David,

In light of the tank fire in La Porte, I'm trying to make sense of tank inspection guidelines found here:
https://www.epa.gov/sites/production/files/2014-04/documents/7_inspectionsevaluation_testing_2014.pdf Can you answer a couple questions for me:

1. Is there a recommended age/lifetime of an aboveground storage tank? Same question for underground storage tanks.
2. This document refers to regional inspectors. Who inspects the tanks – trained personnel in the company, an outside company, EPA personnel or someone else?

Thanks,
Tina

Tina Macias
Investigative Producer
KHOU 11.
STANDS FOR HOUSTON

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Sincerely,

Carmen Assunto
State and Local Liaison
U.S. EPA Region 6
Houston Laboratory
281-983-2196